

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

MARC C. JACKSON,

Plaintiff,

Case No.

-vs-

HON.

BLUE CROSS BLUE SHIELD OF MICHIGAN,
a non-profit Michigan corporation,

Defendant.

CHARLES W. PALMER (P29271)
Charles W. Palmer, P.C.
Attorney for Plaintiff
140 Elm Street
Wyandotte, MI 48192
(734) 284-5550
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COMPLAINT

Plaintiff, Marc C. Jackson, by and through his attorney, Charles W. Palmer, P.C., says as follows:

1. Plaintiff is a resident of the City of Detroit, Wayne County, Michigan.
2. Defendant Blue Cross Blue Shield of Michigan is a non-profit Michigan corporation doing business in Wayne County, Michigan.
3. This Court has jurisdiction pursuant to ERISA, 29 U.S.C. Section 1132 (e) and 28 U.S.C. Section 1131.
4. Venue in this Court is appropriate because the actions complained of herein occurred in the Eastern District of Michigan, Southern Division.
5. Plaintiff was the beneficiary of a long-term disability policy with defendant.

6. Defendant has denied plaintiff's administrative appeals of its decision denying plaintiff long-term disability benefits beginning May 1, 2016.

7. Plaintiff has exhausted all administrative remedies prior to bringing this action.

8. Plaintiff's claim seeks to recover benefits, enforce rights, including a clarified right to future benefits under 29 U.S.C. Section 1132 (a) (i)(B).

9. Defendant's denial of plaintiff's long-term disability benefits is arbitrary and capricious and not supported by substantial evidence in the administrative record.

10. Plaintiff's claim seeks to recover benefits, enforce rights, including a clarified right to future benefits under 29 U.S.C. §1132(a)(1)(b).

WHEREFORE, plaintiff requests this Honorable Court enter a judgment for plaintiff against defendant for damages, including past, present, and future long-term disability benefits, plus attorney fees and costs pursuant to 29 U.S.C. §1132, and any other relief this court may deem equitable, just and proper.

Dated: August 5, 2017

Respectfully submitted,

/s/ Charles W. Palmer

CHARLES W. PALMER (P29271)
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CERTIFICATION OF SERVICE

I hereby certify that on August 5, 2017, I electronically filed the foregoing Complaint with the Clerk of the Court using the ECF system.

/s/ Charles W. Palmer

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